March 31, 2023

VIA ECF

The Honorable Alvin K. Hellerstein U.S. District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

Re: *Harpo, Inc. v. Jackson et al.*, No. 22-cv-06787 (S.D.N.Y.)

Dear Judge Hellerstein:

We write jointly on behalf of the parties to respectfully request an extension of time for Defendants to respond to Plaintiff's Complaint (Dkt. 1) so that the parties may complete their efforts to resolve this dispute.

The parties have reached an agreement in principle to settle this action. The requested extension of time will enable the parties to finalize and execute a settlement agreement.

The current deadline for Defendants to respond to the Complaint is Wednesday, April 6, 2023. In light of the advancements that have been made toward fully resolving this dispute, the parties respectfully jointly request that the current deadline for Defendants to respond to the Complaint be extended by 28 days, to <u>Thursday, May 4, 2023</u>. The parties do not anticipate seeking any further extensions.

There have been two previous request to extend the time for Defendants to respond to the Complaint from February 6, 2023 to March 8, 2023 (Dkt. 13) and from March 8, 2023 to April 6, 2023 (Dkt. 16). The Court granted those extensions. Dkt. 14, 17.

No other dates have been scheduled by the Court.

Respectfully submitted,

/s/ /Tamara Carmichael

Tamara Carmichael DORSEY & WHITNEY LLP 51 West 52nd Street

New York, New York 10019

Tel: (212) 415-9345 Fax: (212) 953-7201

Carmichael.tamara@dorsey.com

Attorney for Plaintiff

Respectfully submitted,

/s/ Dylan I. Scher

Dylan I. Scher

QUINN EMANUEL URQUHART &

SULLIVAN, LLP

51 Madison Avenue, 22nd Floor New York, NY 10010

Tel: (212) 849-7000

Fax: (212) 849-7100

dylanscher@quinnemanuel.com

Attorney for Defendants